

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CIVIL DIVISION**

CASE NO. 9:24-80920-CIV-CANNON

JEFFREY BUONGIORNO,

Plaintiff,

v.

ALEJANDRO MAYORKAS, ET AL

Defendant.

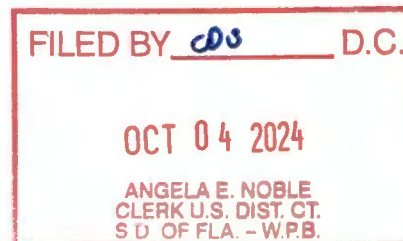


EXHIBIT LIST

By stating specific objections to exhibits, the parties do not alleviate their responsibility to introduce and meet admissibility requirements with respect to any exhibit. The parties may abbreviate objections as needed. The number in the "Exhibit Number" column must indicate the pre-marked identification label (e.g., P-1 or D-1).¹

Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
NOTE	P1 to P4 Left Blank Intentionally to accommodate a prior filing.				
P5	Canvassing Board Meeting minutes of August 9 th , 2024	PAGE_0001-PAGE_0002			
P6	Public Records Request #23-92. Time Stomped with 9/13/1984 date.	PAGE_0001-PAGE_0002			
P7	DS-DE 40 Form version 2/2024. Page_0001 1 is Excel	PAGE_0001-PAGE_0002			

¹ The Plaintiffs' exhibits must be marked numerically with the letter "P" as a prefix; the Defendants' exhibits must be marked numerically with the letter "D" as a prefix.

Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
	format and Page_0002 is .PDF				
P8	DS-DE 40 used in 2020 Election	PAGE_0001-PAGE_0002			
P9	Canvassing Board meeting minutes from 9/25/2024	PAGE_001-PAGE_0003			
P10	EL52 Report for Nov 8, 2022 Election (59 Blank Ballots cast) PALM BEACH	PAGE-0001			
P11	EL52 Report for NOV 3, 2020 (20,313 Blank Ballots cast) PALM BEACH	PAGE-0001			
P12	EL 52 Report, NOV 8, 2020. Broward County (60,165 Blank Ballots cast)	PAGE-0001			
P13	Witness Affidavit Chris Gleason Attesting to Public Records altering	PAGE_0001-PAGE_0005			
P14	9/26 Email from Supervisor Link stating she is not a member of the canvassing board	PAGE_0001			
P15	VR Terms & Conditions, not liable for protection of data	PAGE_0001			
P16	ElectionsFL.org threat assessment report	PAGE_001-PAGE-PAGE-011			
P17	VRSystems.com threat assessment Report	PAGE_001-PAGE_048			
P18	Vr Systems Memo regarding Outage on 8.20.24	PAGE_001			
P19	Records Request 24-1075	PAGE_001-PAGE_002			
P20	Attorney letter re: contesting Digital Signatures	PAGE_001			
P21	Affidavit from John W. Liccione	PAGE_001-PAGE_0004			
P22	Affidavit from John Siamas	PAGE_001-PAGE_004			

P22

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AFFIDAVIT OF JOHN SIAMAS

REGARDING CHAIN OF CUSTODY FOR STATEWIDE VOTE BY MAIL

EARLY VOTING LIST AND THE IRREGULARITIES OBSERVED WITH THE DATA

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared John Siamas, who, being duly sworn, deposes and says as follows:

1. Affiant's Identity:

I, John Siamas, was a Republican candidate for the Florida State Senate District 21 Primary Election held on August 20th, 2024. I am over 18 and competent to make this affidavit and have personal knowledge of the facts stated herein.

2. Purpose of Affidavit:

This affidavit is made to establish the chain of custody for the Statewide Vote-By-Mail Early Voting List (the "Voting List") that I obtained directly from the Florida Division of Elections at the following url:

<https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports>

3. Acquisition of Voting List:

I personally accessed the Florida Division of Elections secure online system for authorized individuals as clearly stated in FL Stat 101.62 and FAC 1S-2.043. I used the following secure URL

<https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports>

provided to me by the Division of Elections to download the daily updates of the Statewide Vote-By-Mail Early Voting List.

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4. Secure Download Process:

The Florida Division of Elections provided me access to the Voting List via the following secure link

<https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports> ,

which required my unique login credentials provided by the Division. These credentials were assigned specifically for my use as a registered recipient of the Voting List after directly registering with the State at the following url:

<https://countyballotfiles.floridados.gov/Account/Register>

5. Receipt of Voting List:

Upon logging into the secure platform, I downloaded the Voting List, which was provided in .txt and/or .zip format. I saved the downloaded files directly to my computer under secure conditions, ensuring that the data was not altered.

6. Handling and Storage:

After downloading the Voting List, I took immediate steps to preserve the integrity of the data. The files were securely stored on my computer, which is protected by encryption and password protection. No unauthorized individuals had access to the Voting List from the time I downloaded it until it was submitted in connection with this case.

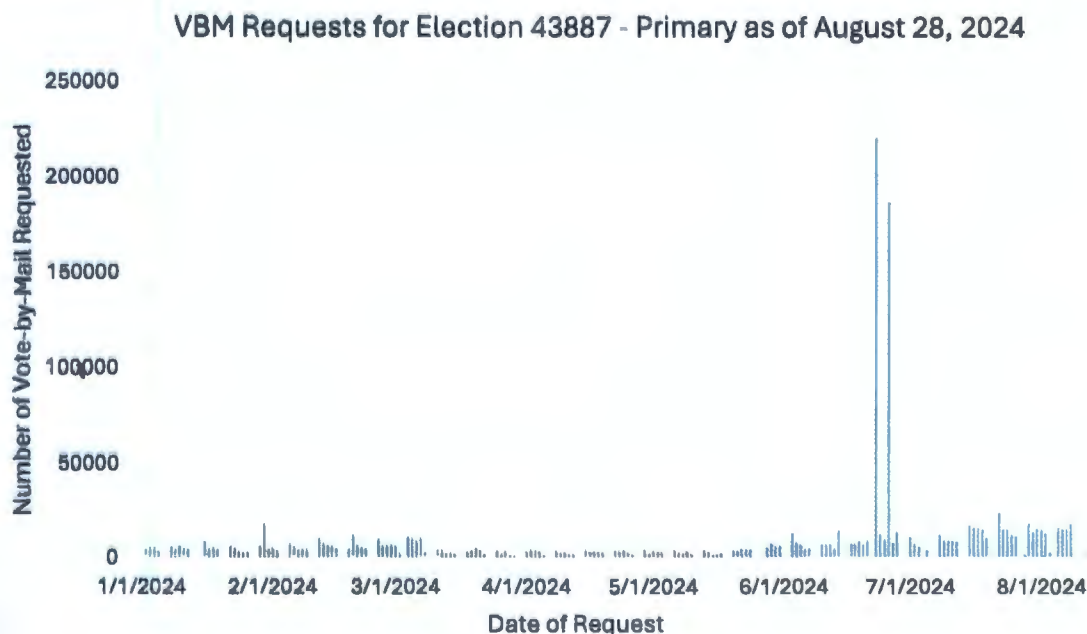
7. Integrity of the Data:

I affirm that the Voting List downloaded from the Florida Division of Elections has not been altered, modified, or tampered with in any way. The files I obtained are in the same condition as when I downloaded them directly from the Division's secure platform.

8. Irregularities and Anomalies with the Vote-By-Mail Ballots

Here are the following anomalies and irregularities in the vote-by-mail ballots and the system implemented to administer the vote-by-mail ballots:

a. When observing the vote-by-mail ballot (VBM) request data as of August 28, 2024, provided by the Florida Division of Elections for the primary elections, we notice two very unusual outliers in the requests made. Here is a visualization of the daily requests made across the entire state in 2024:



The two extreme outliers represent the counties of Pinellas and Miami-Dade. Pinellas county received 219,675 vote-by-mail ballot requests on Sunday June 23, 2024 and Miami-Dade received 179,358 vote-by-mail ballot requests. The following is a factual analysis of these anomalies.

I - Pinellas County

a. On Sunday June 23, 2024, there were 219,675 vote-by-mail ballots requested from the Pinellas County Supervisor of Elections office. Of those 219,675 vote-by-mail requests, according to the vote-by-mail report dated August 28, 2024, provided by the State,

- i. 219,628 (99%) did not provide a Driver's License or Last 4 of SSN as part of the request;
- ii. 114,581 ballots were marked as "voted" in the vote-by-mail report;
- iii. **114,546 (99.9%)** of the "voted" vote-by-mail ballots did not provide a Florida State Driver's License or last four of their social security number when making the request;
- iv. 160 of those vote-by-mail ballots which appear on the VBM report do not appear in the "Voter History" file date 09/24/2024.
- v. The number of identified deceased voters whose date of death was prior to the June 23, 2024, that requested a vote-by-mail ballot is 16.
- vi. When we compare the VBM file to the "Voter History" file we see that the total number of "Mail Cast Votes" with the code "A" is 128,178, a difference of 13,597.
- vii. These 114,546 vote-by-mail ballots represent 68.1% of the total votes cast in Pinellas County.

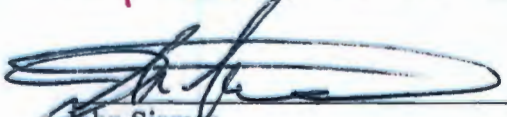
II - Miami-Dade County

- i. On Wednesday June 26, 2024, there were 179,358 vote-by-mail ballots were requested from the Miami-Dade County Supervisor of Elections office.
- ii. 178,848 ballots (99.7%) did not provide a Driver's License or Last 4 of SSN as part of the request;
- iii. 104,804 ballots were marked as "voted" in the vote-by-mail report;

- iv. 104,566 (99.8%) of the "voted" vote-by-mail ballots did not provide a Florida State Driver's License or last four of their social security number when making the request;
- v. 407 of those vote-by-mail ballots which appear on the VBM report do not appear in the "Voter History" file date 09/24/2024.
- vi. When we compare the VBM file to the "Voter History" file we see that the total number of "Mail Cast Votes" with the code "A" is 104,396, a difference of 170.
- vii. The 104,566 vote-by-mail ballots represent 68.1% of the total votes cast in Miami-Dade County for the August 20, 2024 Primary Election.

FURTHER AFFIANT SAYETH NAUGHT

Dated this 4th day of October, 2024


John Siamas

NOTARY ACKNOWLEDGEMENT

STATE OF FLORIDA
COUNTY OF PINELLAS

SWORN TO and subscribed before me this 4th day of October, 2024,
by John Siamas, who is personally known to me or who has produced a Florida State
Driver's License as identification.



Notary Public
State of Florida

Commission Expires August 10th 2027

